



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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AUG 17 2004

Ref: EPR-N

Mr. George Weldon
Forest Supervisor
Ashley National Forest
355 North Vernal Avenue
Vernal, UT 84078

Re: Trout Slope West Timber Project FEIS
CEQ 040327 —

Dear Mr. Weldon:

In accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act, the U.S. Environmental Protection Agency - Region 8 (EPA) has reviewed the Trout Slope West Timber Project, Final Environmental Impact Statement (FEIS) and Record of Decision. The Trout Slope area of the Ashley National Forest is heavily impacted by past management actions including timber management, grazing and recreation vehicle impacts. The project area includes habitat for Colorado Cutthroat Trout, Goshawk and Lynx. With this proposed timber sale, the US Forest Service (USFS) proposes to mechanically harvest selected trees on 2,066 acres producing an estimated 9.2 million board feet of timber. Much of the harvest is targeted at beetle-killed and mistletoe-infected trees. Alternatives to the proposed action were developed around the post-project treatment of temporary roads.

EPA has expressed concerns with the Draft EIS for this project focusing primarily on the incremental or cumulative impact of proposed project activities to resources already impacted by past and present uses of the forest. EPA expressed concerns with potential longer-term environmental impacts should the temporary roads be added to the system (Alt. 3 and the Proposed Action) and particularly if the roads remain open to the public (Alt. 3). The USFS has responded to these concerns by selecting the environmentally preferred action alternative, Alternative 3, which closes temporary project roads post-sale and removes structures that could contribute sediment to adjacent waterbodies in the long-term. It is important to note that closed temporary roads can continue to be a source of sediment delivery to streams, and we encourage annual post-project monitoring and maintenance of these closed roads to assure water management features remain operational.



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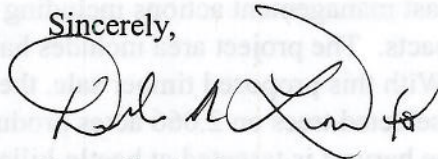
We note that the Record of Decision (p.6) included a discussion of the reasons for closing temporary roads rather than obliterating them, stating, "Obliteration activities such as ripping would create an unacceptable level of erosion and sediment delivery to the streams in the project area. ... Any activities that would dig up rock at the soil surface level and below, such as "ripping" were identified as detrimental practices by Forest engineers and the Vernal District Soil Scientist." It is not clear why obliteration of temporary roads causes "unacceptable" and "detrimental" impacts to streams, but disturbing the soil surface to reconstruct and upgrade these same temporary roads was not judged in the EIS to cause such unacceptable impacts. Future projects in this area should carefully consider this apparent conflict. We did not find an analysis of the relative effects between short-term sedimentation from obliteration and long-term sedimentation from the no-obliteration option.

EPA appreciates the efforts to avoid activity in aquatic resource zones. We share the USFS's concern regarding protection of highly compactable soils. We encourage the USFS to actively monitor soil conditions during wet periods, and take steps to avoid activity if soil moisture levels are high that significant compaction from project activities may occur.

Regarding stream health in the project area and native Colorado River Cutthroat Trout, we encourage the USFS to continue to seek resources for projects to restore stream segments damaged by past activity while continuing to plan future activities to be protective of these resources.

We thank the USFS for including in the FEIS specific responses to EPA's comments. If you have any questions or would like to discuss our comments, please contact me (303-312-6004) or Phil Strobel (303-312-6704) of my staff.

Sincerely,



Larry Svoboda
Director, NEPA Program
Office of Ecosystems Protection
and Remediation